

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-349-E**

IN RE:)	
Joint Petition of Duke Energy Carolinas, LLC)	PETITION
and Duke Energy Progress, LLC to Request)	TO INTERVENE OF CAROLINAS
the Commission to Hold a Joint Hearing with)	CLEAN ENERGY BUSINESS
the North Carolina Utilities Commission to)	ASSOCIATION
Develop Carbon Plan)	

INTRODUCTION

This Docket was opened on November 9, 2021, upon the Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, (hereinafter together as, “Duke Energy”). Petitioner herein, is the Carolinas Clean Energy Business Association, (hereinafter as, “Petitioner”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

PETITIONER

Carolinas Clean Energy Business Association.

1. The Carolinas Clean Energy Business Association (“CCEBA”) is a Mutual Benefit Corporation, incorporated in the State of North Carolina and domesticated to conduct business in the State of South Carolina by the South Carolina Secretary of State’s office.
2. CCEBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in North and South Carolina. CCEBA is a 501(c)(6) organization representing all types of businesses in the clean energy sector, including developers, manufacturing, engineering, construction, professional and financial services, and non-energy businesses wishing to purchase clean energy. With over 50 members, including most of the utility-scale solar developers in North and South Carolina, CCEBA monitors and participates in energy policymaking in both Carolinas. CCEBA has appeared as an intervenor in multiple dockets in North Carolina under its prior name: North Carolina Clean Energy Business Alliance. In South Carolina, CCEBA has assumed the role previously filled by the South Carolina Solar Business Alliance (“SCSBA”).

3. Specifically, CCEBA is a successor in interest for the SCSBA. CCEBA has been substituted as a Party in Interest in over two dozen Dockets of this Commission, by Commission Order No. 2021-167, dated March 10, 2021. This Commission has also subsequently approved CCEBA's intervention in Dockets 2021-88-E, 2021-89-E, 2021-90-E, 2021-93-E, 2021-192-E, 2021-9-E, and 2021-114-E.

4. Petitioner's interests cannot be adequately addressed by any other party.

5. Petitioner's position is that Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important decision to be made in this Docket.

6. The grounds for this Petition are that Petitioner will be directly affected by this Commission's decision in this matter.

7. Petitioner's economic interests will be directly and substantially affected by the outcome of this proceeding and Petitioner's business interests will be directly and financially impacted by this Commission's resolution of the subject matter of this Docket.

8. Petitioner should be allowed to intervene in this Docket, with full rights of participation in this Docket.

9. The granting of Petitioner's Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

10. This Petition to Intervene is timely filed with this Commission.

11. Petitioner is represented by counsel in this proceeding:

Richard L. Whitt,
WHITT LAW FIRM, LLC
401 Western Lane, Suite E
Irmo, South Carolina 29063
Telephone: (803) 995-7719
Richard@RLWhitt.law

WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as this Commission may deem just and proper.

Respectfully Submitted,

/s/Richard L. Whitt

Whitt Law Firm, LLC

401 Western Lane, Suite E

Irmo, South Carolina, 29063

(803) 995-7719

*As Counsel for Petitioner, the Carolinas Clean
Energy Business Association.*

November 19, 2021